

## CHAPTER 4

### Response to Comments on the Draft EIS



## Amendment 24. Response to comments on the Draft EIS

#	PR#	Comment	Response
1	D-A1	"I believe all winter motorized vehicle use off the North Fork Road should be banned in the North Fork Valley."	As natural resource managers of a multiple use agency, we do not feel the entire North Fork should be closed to winter motorized use. The North Fork Road is open to conventional vehicles yearround, and therefore is not open to snowmobiles. See #29. One half of the North Fork Valley, east of the North Fork of the Flathead River, is Glacier National Park, where snowmobiles are not allowed.
2	D-A2	"I think we as US citizens have the right to access land that we own. Make the entire forest available."	You do have access to the National Forest, however this does not necessarily include the right to use a motorized vehicle on the entire forest. Public land management agencies are authorized and directed to regulate the use of off road vehicles, enforce such regulation, and monitor the effects of off road vehicles. This agency may amend or rescind designations if necessary to protect natural resources (Executive Order 11644, as amended by E.O 11989, 1977).
3	D-A3	"Your plan to add snowmobiling access to some 10,000 acres in the North Fork Flathead River drainage and in the Swan River area is poorly conceived and caters to snowmobilers. This is unacceptable. Give priority to wildlife especially grizzlies."	All action alternatives (Alts. 2 – 6) <b>REDUCE</b> snowmobiling access on the forest compared to the existing situation. Alternative one, "No action", allows snowmobiling to occur across 1.1 million acres.
4	D-A3	"Your plan to extend the snowmobiling "season" from March 15 <sup>th</sup> to late April is poorly conceived and caters to snowmobilers."	Snowmobiling has traditionally occurred here until the snow is gone each spring. April dates are not an extension of the traditional season, but rather a shortening of them.
5	D-A4	"We are aware of the hard work that went into the compromise reached by MWA, snowmobilers, and your agency. It is disappointing to discover that you are now willing to dishonor that compromise in favor of an alternative that extends the season for motorized use and the area encompassed by its provisions".	The settlement agreement stipulated that the compromise reached by MWA, the Montana Snowmobile Association, and the Forest Service would be <i>an alternative</i> in the Forest Plan amendment NEPA process. Public input, science, and other resource issues drove other alternatives for consideration, as dictated by Federal law and regulation.
6	D-A4	"Does the biological opinion address the possibility that prolonged snowmobile use will increase the likelihood that these same routes will also become more commonly used by wild animals (ungulates), thus increasing human and animal confrontations and conflicts?"	Snowmobile routes pass briefly through ungulate winter range, and have done so for many decades. Snowmobile use is reduced in all action alternatives, therefore decreasing the likelihood of confrontations and conflicts with wild animals. We expect to receive the Biological Opinion sometime after the release of this FEIS.

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7	D-A4	“How will you quantify the loss of opportunity for solitude?”	Opportunity for solitude <i>is increased</i> with every action alternative. Solitude is available on 1.25 million acres with the no action alternative, and on 1.54 million acres with the preferred alternative.
8	D-A4	How will you maintain the “wilderness character” of those lands impacted by increased snowmobile use?”	The area available for snowmobile use is <i>decreased</i> by all action alternatives. “Wilderness character” is to be maintained for those lands classified as Recommended Wilderness. Recommended Wilderness will be decided upon at Forest Plan Revision. Snowmobiling is not allowed in designated Wilderness and will be strictly enforced.
9	D-A4	“What impact will increased use have on air quality?”	All action alternatives <i>decrease use</i> . The current and expected amount of use on the Flathead National Forest is not substantial enough to approach impacting air quality.
10	D-A4	“What is the likelihood that by increasing the season and use area now will increase the demand for further expansion of motorized use?”	Both the season and use area are reduced by the action alternatives compared to traditional use. Limits on motorized use are currently dictated by wildlife habitat needs. Future demand or changes is speculative, and will largely be driven by population growth rather than this decision.
11	D-A5	“I oppose increasing the motorized winter use of our national forests. Snowmobiles create far too much noise. My experience is greatly diminished by noisy snowmobiles and ATVs. The noise not only spoils the outdoor experience, it also disturbs and stresses wildlife. When areas are opened to snowmobiles, there follows a significant increase in trash and debris left behind in otherwise pristine areas.”	All action alternatives <i>decrease use</i> by motorized vehicles in winter. No new areas are being opened to snowmobiling; trash and debris have not been found to be a problem on this Forest due to snowmobiling. National Forests provide a spectrum of recreational opportunities, some of which is motorized. Snowmobiles are prohibited on 1.3 million acres across the forest with the no action alternative, providing opportunities for a quiet winter experience. All action alternatives decrease the amount of area in which snowmobiles are allowed, and increase the areas available for “quiet use.” Disturbance to wildlife is discussed in Chapter 3.
12	D-A6	“Snowmobiles contribute significantly to noise and air pollution. When you are hiking in the winter country there is such a quiet peaceful feeling that can be completely disturbed and “cheaped” by snowmobiles flying by spitting pollution out into your breath. Please consider that many winter recreation people want snowmobile free area because they are incredibly annoying to the experience we are looking for in the winter country.”	See response to #11. Snowmobile free acres range from 1.3 to 1.6 million acres with the alternatives proposed in this amendment.
13	D-A6	“The Grizzly Bear deserves protection that goes beyond the desires of snowmobile users.”	Grizzly bear habitat protection ranges from 77 to 92 percent with the alternatives. The action alternatives all decrease potential disturbance to grizzly bears.

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14	D-A6	“Do not extend the season through April. That is too late and will cause more conflicts between Grizzlies and snowmobilers.”	Traditional (several decades) snowmobile use has occurred until the snow is gone. All alternatives decrease the likelihood of conflicts between grizzlies and snowmobilers.
15	D-A6	“Respect the need for quiet country and how snowmobilers disrupt that solitude.”	National Forests provide a spectrum of recreational opportunities, some of which is motorized. Snowmobiles are prohibited on 1.3 million acres across the forest with the no action alternative, providing opportunities for a quiet winter experience. All action alternatives increase that area.
16	D-A6	“Recognize that snowmobiles pollute the air and are horribly offensive to many of us.”	The level of snowmobile use on the Flathead NF is not of a magnitude to cause air pollution. Exhaust fumes in the immediate vicinity of a snowmobile do have an unpleasant odor, but the brief duration of exposure to a non-motorized recreationist is not expected to create health problems. In addition, there are over 1 million acres on the Forest where snowmobiling would be prohibited.
17	D-A7	“Snowmobiles are a real bother to those of us who value the peace and tranquility of the back country.”	See #15.
18	D-A7	“Snowmobiles disturb wildlife in their winter range and cause them stress when they can stand it least.”	Snowmobiling and other human activities that coincide with ungulate winter range do influence wildlife activities. Ungulate winter range occurs in the valleys (with the exception of mountain goat winter range) and were often areas first settled. A large portion of winter range on the Flathead NF occurs in areas of mixed ownership, ie Swan Valley and the North Fork, or has been permanently altered from previous activities—Hungry Horse Reservoir. There are ~82,100 acres of Management Areas 9 and 13 which are white tailed deer/mule deer and elk winter range respectively on the Forest. Between ~29,100 and ~41,000 acres are restricted from snowmobiling in all action alternatives. In addition there are provisions in these MAs that allow additional site-specific restrictions if conflicts should occur. All action alternatives reduce the area permitted for snowmobile use and increase wildlife security in winter.
19	D-A7	“Snowmobiles STINK.”	Exhaust fumes in the immediate vicinity of an operating snowmobile may have an unpleasant odor, but the duration of exposure for a non-motorized recreationist is extremely brief.
20	D-A8	“Standards that fail to reduce motorized activity on the nation’s public lands and waters do not well serve the national public. Pollution and global warming must be suppressed.”	See #9.

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21	D-A8	“Our national forests exist to serve the national public, present and future. They do not exist to serve as a playground for temporal users who engage in activities detrimental to the environment.”	National forests provide a spectrum of recreational opportunities, in keeping with a multiple use heritage. Snowmobiling is one of many recreational pursuits that are appropriate on NFS lands.
22	D-A8	“Our national forests do not exist to provide a money making opportunity for a small sub-set of the national public. Let not the tail wag the dog.”	As described in the chapter 3 section on Economics, snowmobiling has very little influence on the local economy.
23	D-A8	“Quality water is of increasing scarcity and cost. How can any damage be justified?”	As stated on Page 3-78 of the DEIS, and 3-80 of this FEIS, no effects to water quality are expected.
24	D-A8	“Any action favoring increased motorized activity winter or summer, decreases air quality.”	See #9.
25	D-A8	“Vegetation- Damage is inherent.”	As described on page 3-86 of the DEIS, and 3-88 of the FEIS, during an average season of snowfall in northwest Montana, snowcover of herbs and shrubs is complete and vegetation is protected. Damage to saplings is so minor as to be inconsequential at the forest scale.
26	D-A8	“How does a throttle addicted character, exuberant at his sled’s performance in a “popular snowmobile play area’ have the time or inclination, to “enjoy winter scenery”?”	Based on public input during scoping and comments on the DEIS, scenery is indeed a major factor in where people choose to snowmobile. As with any recreational user group, people who enjoy snowmobiling represent a wide range of interests and personalities.
27	D-A10	“I am extremely disappointed that the preferred alternative you’ve published allows such extensive snowmobiling.”	The preferred alternative in the DEIS proposes to <b>reduce</b> the amount of area traditionally used from 1.1 million acres to 747,000 acres.
28	D-A10, D-A16 D-A17 D-A54 D-A107	“The EIS must include an alternative restricting snowmobiles forest wide to designated routes and play areas, not just in the North Fork.”	There are no resource issues to drive this alternative. See Chapter 2.
29	D-A10, D-A16 D-A17 D-A54 D-A107	“The EIS must include the alternative requested by Swan View Coalition: restricting snowmobiles to those roads open to conventional passenger vehicles. This will provide snowmobile opportunities on designated routes and allow adequate snowmobile access to backcountry areas for quiet, non-motorized recreation.”	Snowmobiles are restricted from sharing roads open to vehicle traffic per Montana State Law 23-2-631. Restricting snowmobiles only to unplowed roads eliminates an entire recreational experience, contrary to the recreation opportunity spectrum in accordance with the Forest and Rangeland Renewable Planning Act of 1974, and the National Forest Management Act of 1976.

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30	D-A10 D-A16 D-A17 D-A54 D-A107	“All alternatives must prohibit snowmobiling March 16-November 30 to provide at least some security for big game during hunting season, calving elk in Spring, wolverine and their natal dens, grizzly bears emerging from their dens with young in Spring, and to protect vegetation and soils from snowmobiling on inadequate snowpack.”	As stated on page 3-25 of the DEIS, female grizzly bears on this Forest begin emerging from their dens about April 1. Snowmobiling has traditionally been occurring until snowpack is gone; all alternatives propose reducing the length of season for snowmobiling. With the action alternatives, 84 to 92 percent of grizzly bear denning habitat is closed to snowmobiling yearround. For wolverine, 71 to 84 percent of denning habitat is closed to snowmobiling yearround. Spring snowmobiling occurs at high elevations, elk calving does not. Snowmobiling on inadequate snowpack is extremely uncommon. See Chapter 3 of this FEIS.
31	D-A10	“The vast majority (99%) of the Flathead National Forest should be reserved for quiet, nonmotorized recreation.”	See 11, 15, 21. The preferred alternative would prohibit snowmobiling on approximately 68% of the Forest, before the application of additional site-specific restrictions. The Forest Service is an agency with a multiple use mandate. Neighboring Glacier National Park provides additional quiet use recreation opportunities.
32	D-A11	“I find that on several maps you show a road connecting Canyon Creek and Skookoleel Creek. To my knowledge there is no road at this location.”	That is correct. There is not a road there, only an over the snow route used to access the two drainages. The maps have been changed to eliminate the appearance of a road there.
33	D-A11	“On several of the maps you show restricted year long use for the S1/2, SE ¼ of Section 9, T31N, R21W. This is the location of the Haskill Basin Road which our Company has a R/W on and at sometime in the winter we use snowmobiles to access our land. This is also a very popular year around recreational area which should not have year-long restrictions.”	Thank you for pointing this out. The maps have been changed for the FEIS to reflect this segment of road as open.
34	D-A13	“It is a shame and a disgrace to our American values, that you change your decision on the agreement previously agreed on by a conservationist and snowcatters regarding snowcat access. It is very disheartening that you would be intimidated by a few after working on a compromise that was agreed upon previously.”	The settlement agreement stipulated that the compromise reached by MWA, the Montana Snowmobile Association, and the Forest Service would be <i>an alternative</i> in the Forest Plan amendment NEPA process. The agreement was <i>not a Decision, nor was it a public process as required by Forest Service planning laws</i> . Public input (several hundred letters), science, and other resource issues drove other alternatives for consideration, as required by Federal law and regulations. See Chapters 1 and 2 of the FEIS.
35	D-A14	“I would like to see snowmobiles restricted to forest-wide designated routes.”	Use of over the snow vehicles on National Forest System lands is recognized as an acceptable recreational activity within the Recreation Opportunity Spectrum. There are no resource issues at this time to restrict snowmobiles to routes only, forest wide.

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36	D-A14	"I would like to see snowmobiles prohibited from travel on federal lands from March 15 – November 15 to protect wildlife."	See #30.
37	D-A15	"I would like to see snowmobiles prohibited from areas that conflict with cross country ski routes."	All designated cross country ski areas currently prohibit the use of snowmobiles, except for grooming of ski trails.
38	D-A15	"We support and encourage no additional use of these vehicles in our parks."	The National Park Service is a different agency than the US Forest Service, with different management philosophies and agency missions.
39	D-A18	"I'm against any Forest Revision, Amendments or proposed alternatives, stated by the Forest Service and "Greenies". Let's be fair and include MFMU and the multitudes of us who also enjoy the Multiple Use concepts of all the Forest Lands, for use by ALL the people."	Please see FEIS Chapter 1, Purpose and Need for an amendment.
40	D-A18	"As snowmobile open areas close, open other areas of equal amounts of trails and terrain, of same types, for snowmobilers."	See "Alternatives considered but dropped from further evaluation" in Chapter 2 of this FEIS.
41	D-A19	"Alternative 2 reflects a settlement reached just a couple years ago amongst competing interest groups and is undoubtedly the most balanced approach in allowing recreational activities while protecting lands and wildlife."	Not all members of the public felt Alternative 2 was balanced; therefore we present alternatives to the settlement agreement.
42	D-A20	"We're sickened to see the continuing, relentless encroachment by motorized vehicles into roadless wildlands all over the U.S."	All action alternatives decrease the amount of area and length of season from that which has been traditionally used by snowmobilers on the Flathead.
43	D-A22	"Please set opening and closing dates using scientific data so as to protect our wildlife."	The most recent scientific data will be considered along with social needs to determine opening and closing dates that are not a threat to the continued existence of wildlife.
44	D-A23	"There will be strong political pressure to drive everywhere but there is also strong political pressure and support for good resource management which is Alternative 2."	This amendment is largely a social issue in a natural resource setting. The final decision will have to take in to consideration both social and environmental concerns.

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45	D-A24	“I am naïve enough to misunderstand “proposed” action and “preferred” action. I read the whole thing believing that the FS also planned to implement the proposed action. Now I realize that you are planning to go to Alternative #3, the “preferred”. “	The action to be implemented is not known until the Record of Decision is published. The proposed action is the first attempt to meet the purpose and need for a proposal. Alternatives are developed based on public input and further environmental data gathering and analyses. Any one of the alternatives may be chosen and implemented by the Decision maker.
46	D-A25 D-A27 D-A28	“I support Alternative 2 because it mirrors the historic Flathead Winter Recreation Agreement negotiated between the Montana Wilderness Association and the Montana Snowmobile Association.”	Meetings and discussions have continued with the parties in the settlement agreement. The Flathead Snowmobile Association has participated, as well as MWA and MSA. All parties also supported Alternative 3, and now Alternative 6. Alternative 2 is not supported by FSA, who are the people who actually live and recreate here.
47	D-A25	“Keep these noisy pests out of the roadless areas in the North Fork and Middle Fork Flathead drainages and most importantly the roadless terrain near Swan Peak. Please protect the peace, quiet, and wildness of these areas.”	Alternatives 2, 3, 4, and 6 would prohibit snowmobiling in the majority of the roadless areas on the Forest. (Project Record U-47)
48	D-A26 D-A27 D-A28 D-A29 D-A31, D-A32, D-A33, et al.	“I support Alternative 2 because it provides protection for important roadless, non-motorized lands in the North Fork and Middle Fork Flathead drainages.”	Alternatives 3, 4, and 6 afford the same amount of protection to roadless, non-motorized lands as Alternative 2.
49	D-A27 D-A36 D-A37 Et al.	“Alternative 2 protects key mountain goat habitat from Bond Creek south to Holland Lake in the Swan Range.”	Alternative 2 allows snowmobiling on 590 acres of mountain goat habitat. Alternatives 3 and 4 protect an additional 290 acres, allowing snowmobiling on 300 acres of goat habitat. Alternative 6 nearly eliminates snowmobiling in mountain goat habitat.
50	D-A27. D-A31, D-A32, D-A33 Et al.	“When setting opening and closing dates, use the best available scientific data, not political pressure, to protect wildlife.”	See #43.
51	D-A30	“I recognize the need for scientific studies to provide guidance to conserve and protect seasonal habitats for deer, elk, goats, bears, and mid-size carnivores.”	There is still much to be learned about habitat needs and activity patterns for many wildlife species. Continuing our quest for knowledge for all wildlife species in a scientific manner provides the best means to properly manage our wildlife resources. The best available science was used in this analysis.



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52	D-A33	“Alternative 2 best balances competing interests and helps me to know where I can expect to find natural peace and quiet.”	All alternatives provide areas of peace and quiet on the Flathead NF, ranging from 1.2 million acres with the no-action alternative, to 1.56 million acres with Alternatives 2 and 4.
53	D-A34	“We believe the Forest Service must take into account the need for quiet winter snowscapes and manage equally for all winter uses and needs-not just for those who are loudest.”	See #15.
54	D-A35	“Protecting habitats can benefit us all in terms of tourist dollars spent by those wishing to ski, snowshoe, and hike among the elk- and deer-studded ravines and outcrops.”	It is appropriate to provide a variety of recreational opportunities on NFS lands.
55	D-A39	“My understanding is that the court saw problems with the way the Forest was ignoring unlimited snowmobiling, as was pointed out by the Wilderness Assoc. The court suggested these folks get together and find a better compromise than the judge would have imposed. A lot of good snowmobiling places would have been off limits. A lot of pristine lands would have eventually been used by snowmobiles. The compromise was a good one and should be honored. Please adopt Alternative 2.”	Local residents of the North Fork of the Flathead and the community of Swan Lake felt they were not represented during the settlement agreement negotiations. Alternatives 3 and 6 better meet the needs of the local community, and are supported by all parties to the settlement agreement. The alternative chosen for implementation will require balancing social and environmental needs.
56	D-A40	“Modern snowmobiles are inherently noisy; cross country skis or snowshoes are quiet in motion or at idle. Respect for nature and our fellow human beings through silence, is an opportunity the FNF can foster.”	See #15.
57	D-A43	“The setting of opening, and especially closing dates would, in my opinion best be served by Alternative 4, which is April 1 <sup>st</sup> . This date is the recommendation of the wildlife biologist and we should recognize their expertise and not be influenced by others who are only concerned with their recreational pleasure or those willing to weakly compromise.”	A variety of choices are explored in the FEIS, and their effects disclosed so that the Decision maker can make an informed decision. .

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58	D-A43	“In the Swan, strong consideration should be given to protecting goat habitat between Bond Creek and Holland Lake. I hiked the Bond Lake/Trinkus trail a week ago and experienced dirt bikers speeding up this trail. This area should be off-limits to motorized traffic year long.”	Goat winter range is specifically protected with Alternatives 3, 4, and 6. Specific yearlong closures are outside the scope of this amendment.
59	D-A44	“The wildlife of the Flathead National Forest deserves to be able to exist unmolested by snowmobiles during the winter months when their stress factors are at the extreme. So many acres are already available to snowmachines. Is it too much to ask to save a quiet, serene area where snowshoers and skiers can watch foraging moose and elk?”	See #15.
60	D-A45	“I am interested in securing maximum preservation of native wildlife....wildlife which is seriously threatened by noise/motorized activity in key areas during the winter.”	Effects to wildlife are described in chapter 3.
61	D-A45	“I am interested in securing the maximum preservation of appropriate roadless areas in the Flathead NF...areas which have wilderness potential.”	Several alternatives would prohibit snowmobile use in much of the roadless and recommended Wilderness areas on the FNF.
62	D-A45	“I am interested in securing the maximum preservation of areas where the non-snowmobiling public can enjoy quiet winter recreation.”	See #15.
63	D-A46	“There are so few places where the peace and quiet of nature can be enjoyed, where animals can live with limited invasion by humans, where we still have a voice that will protect these disappearing places.”	With all alternatives, including no action, 51% to 67% of the Flathead National Forest would provide winter peace and quiet.
64	D-A52 D-A151	“A “no-loss” clause needs to be added to this plan to stop the future loss of riding area to vegetation or litigation. This clause should set aside an acre for acre replacement for land lost.”	See “Alternatives considered but dropped from further evaluation” in Chapter 2.

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65	D-A52	“The closure dates for some areas seem early, I would like to see all areas open until June 1. I am continually told that the grizzly bear is the reason for these early closures. If you have the data for closure dates why can we not see the data for numbers of grizzlies and the effects that snowmobiles have on them in the den. I was shown a bear study that stated that the number of grizzlies in the area north of jewel basin was larger than the number in Yellowstone.”	Mace and Waller (1997) found that bears begin to emerge as early as the middle of March and as late as mid-May. Males are typically the first to exit dens and females usually begin emerging a couple of weeks later. Table 4.1 on page 37 of the final report for Grizzly Bear Ecology in the Swan Mountains shows that most of the 30 collared grizzly bears that provided information on 78 denning episodes first exited the den in April. The number of grizzlies in the NCDE is unknown, but the DNA project in progress should provide a good point estimate. Hopefully along with continued monitoring grizzly bear population trends can be established. There have been no studies on the effects of snowmobiling on denning grizzly bears. Linnell <i>et al.</i> 2000 published a literature review on the effects of disturbance to denning bears, and snowmobiles would be expected to result in similar responses once detected.
66	D-A52	“I have been told that the bridge at Lost Johnny will be taken out. Is this true. If the bridge is taken out I am afraid that Lost Johnny Creek may have a problem with snowmobiles crossing and causing sediment. As far as I know the 28000 acres of Lost Johnny around Jewel Basin are still open to snowmobiling.”	The Lost Johnny Bridge has been deemed unsafe. The Lost Johnny area is open to snowmobiling in all alternatives. Any site-specific action proposed by the District is outside the scope of this programmatic decision.
67	D-A52	“As the snowmobile area continues to shrink I believe that people will be forced to snowmobile in areas that are not open.”	Snowmobiling in areas that are not open can lead to a minimum fine of \$100. Repeat offenders may be fined up to \$5000 and risk confiscation of snowmobile until the issue is adjudicated. The offender may be subject to a criminal complaint with a mandatory appearance in court.
68	D-A52	“I believe that snowmobiling out of bounds is wrong. If you had more enforcement personnel out in the field with the machines and the skills to monitor these areas, I believe this would become a non-issue.”	Monitoring and enforcement are part of our annual budget requests to Congress.
69	D-A53 D-A67 D-A71	“I would like to see snowmobile use further restricted than it would be in Alternative 2. There is wildlife habitat south of Red Meadow Road that deserves further study and protection. Suitable habitat must be protected if grizzly bears, wolves, and a host of other wildlife are to do more than just survive into the future.”	As shown on page 3-33 of the DEIS, and in this FEIS, snowmobiling is not allowed on 92% of modeled grizzly bear habitat with Alternatives 2, 3, or 4. It is stated on page 3-45 of the DEIS, and in this FEIS, that wolf populations in the Northwest Montana Recovery Area have increased steadily the last three years with more liberal snowmobile restrictions than any of the alternatives contain.

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70	D-A53 D-A67 D-A71	“The areas in Bond Creek, Bethel Creek near Swan Peak, winter range around Squeezer Creek and the Foothills Trail from Cooney Lookout to Holland Lake must be off limits to snowmobile access now.”	Alternative 6 includes additional closure areas in the places you mention.
71	D-A53 D-A67 D-A71	“If Alternative 3 is the Forest Service’s preferred alternative and not Alternative 2 as per the negotiated agreement, I believe that it is only fair that since acreage has been pulled to accommodate low elevation travel along the North Fork of the Flathead River, that changes should be made to mitigate this removal of acreage by adding acreage back into Alternative 2. Huntsberger Peak should be removed as an area opened for snowmobile access, low elevation travel routes should be formalized, and separate low elevation cross country ski routes should be developed to reduce travel conflicts. “	The settlement agreement stipulated that its version of the maps was to be one of the alternatives in this amendment, not that it must be the final product. Alternative 2 reduces the traditional snowmobile area from 1,095,500 acres to 737,900 acres, a reduction of 357, 600 acres. Adding 9200 acres to Alternative 3 does not appear to need “mitigating” from any natural resource standpoint. All alternatives are a substantial reduction from the traditional use area. Huntsberger Peak is not open to snowmobile access in Alternatives 2, 3, or 4. Developing cross-country ski routes is outside the scope of this amendment.
72	D-A53 D-A67 D-A71	“I believe that enforcement funding should come from a combination of gas tax funds, which go to support snowmobile grooming, and fines for trespassing. First time trespassing should receive a warning. Repeat trespassers should receive stiff fines and seizure/sale of snowmobiles.”	See #67
73	D-A58	“Alternative 2 is already in place and to change the boundaries now would cause confusion. Please support this alternative; it was the original agreement forged by two opposing interest groups and it is the most reasonable, as well as the most credible, since it was agreed upon through intense negotiations.”	Alternative 2 (the settlement agreement) is in place now as a temporary solution, up until such time as the public planning process required by the National Environmental Policy Act, can be completed. Considering ALL public input is what makes our Decisions credible and legal. Entire communities felt they were not well represented at these negotiations.

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74	D-A59	<p>“The route you mapped between Rd. #9899 (Tepee lake Rd) and Rd. #907 (Wedge Canyon) should not be included as an open snowmobile route. No clear route exists between these two roads. Culverts are out and it’s completely overgrown, and there is usually no way to cross Teepee Creek.. Designating a snowmobile route between the roads 9899 and 907 is unacceptable because it not only enables but also encourages motorized use to spread where there is currently <u>no</u> motorized use. “</p>	<p>If this route received no use before and one usually cannot cross Teepee Creek, it is unlikely that it will receive a great deal of use in the future. The area open to snowmobiling in the North Fork was reduced from 309,300 acres to 30,900 acres with the Settlement Agreement. That’s a closure of 90%. Eliminating the remaining routes on the North Fork does not seem necessary at this juncture.</p>
75	D-A63	<p>“I am very unhappy with the settlement and the resulting amendment set forward by the Forest Service. We have lost most of the area we used to ride in, for example,</p> <ol style="list-style-type: none"> <li>1. Whale Creek and Moose Creek areas</li> <li>2. The entire north side of the Whitefish Range from Werner Peak to Diamond.</li> <li>3. Access to Whale from Weasel Lake</li> <li>4. Areas connecting the North Fork Road to these areas</li> <li>5. Areas in the south Fork and Swan which had nothing to do with the original closure request by the Wilderness people.</li> <li>6. You now want to force the bear closure date on us which no one has enforced since Amendment 19 was enacted.</li> <li>7. Forest road closures in general.</li> </ol> <p>I do not feel Mr. Brown nor the Forest Service acted in our best interests.”</p>	<p>Please refer to the map of the North Fork for Alternative 5. Without the settlement agreement, the closures shown on the map would be in effect now. Alternative 5 remains a viable option for the decision maker. Management area 2A lands from north of Whitefish Mtn. to Smith Creek would be closed to motorized use. Alternative 5 would allow motorized use to continue in MA 2B lands in the Swan.</p> <p>Proposed season ending dates vary.</p>
76	D-A63	<p>“I would consider supporting Alternative 3 if the Forest Service would add a no net loss clause. If we lose an area for whatever reason, it will be replaced with another of equal value to the one lost.”</p>	<p>See “Alternatives considered but dropped from further evaluation” in Chapter 2. The Forest Service has the authority to regulate snowmobile use and cannot speculate on unknown future events.</p>
77	D-A64	<p>“I would suggest that the areas in the South Fork north of the Jewel Basin be open until June 1. This area has never had a formal closure date.”</p>	<p>Alternative 6 of the FEIS proposes a May 30 closure date in the Lost Johnny area north of Jewel Basin.</p>

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78	D-A66	“Snowmobiles, which have thousands of square miles in which to operate currently, spoil this quiet, pollute the air, and damage wildlife habitat. There is no reason to extend this air and noise pollution throughout an even larger area. “	All of the action alternatives <b>reduce</b> the area that has traditionally been used by snowmobilers.
79	D-A68	“Please make sure that snowmobile use does not extend into spring season. Late season skiers and snowshoers looking for quiet would be disturbed by snowmobiles in spring. To protect animals coming out of hibernation please cut the snowmobile season off by the 1 <sup>st</sup> of March.”	See #30.
80	D-A75	“I have enjoyed ski touring on the Flathead and find its lovely backcountry a joy to experience. A truism of recreation use is that one non-mechanized traveler can share the woods with many others, but on mechanized user can disturb the experience for dozens who seek quiet. The proposed action alternative appears to reflect a sincere effort on the part of user groups to strike some sort of balance between these conflicting interests.”	See #12.
81	D-A82	“As a person who has owned snowmobiles, it was amazing that three diverse groups were able to hammer out a decision on snowmobile use in the North Fork and Swan Range. Why would the Forest Service want to change this agreement to something different. All groups had to give and take, so it must be a fair and equal agreement. “	Decisions in the Forest Service are made through a public planning process, as required by law. Based on public input, not everyone felt the settlement agreement was fair and equal. In accordance with Federal law (National Environmental Policy Act), alternatives were developed and analyzed.
82	D-A87	“Alternative 2 embodies the substance of the Flathead Winter Recreation Agreement reached with great effort and diligence by the Montana Wilderness Association and the Montana Snowmobile Association. It is important to honor that agreement as it represents the consensus arrived at between the vast majority of actual winter users of the forest. This decision ought not to be based on the noisy carping of a bitter minority of motorized zealots who would ruin the winter experience of many times their numbers of citizens devoted to quiet enjoyment of naturally quiet an peaceful lands.”	See #81

#	PR#	Comment	Response
83	D-A87	“Areas that are roadless in summer ought not to be invaded by machines in winter. It makes no sense and subverts the intent of the law.”	Alternatives 2, 3, 4, and 6 would prohibit snowmobiling in the majority of the roadless areas on the Forest.
84	D-A107	“Allowing snowmobiling through April 30 would violate the current Forest Plan closure beginning March 15. The existing closure date is intended to protect wildlife like denning wolverine, emerging grizzly bear, and calving elk. We believe it is time that you did enforce this closure and ensure that grizzly bear populations are not being impacted by snowmobile use.”	Any change in closure dates from this process will <i>amend</i> the current dates in the Forest Plan; therefore there would be no violation. Alternatives 2, 3, 4 provide security for 92% of bear denning habitat, regardless of dates.  Elk calving usually occurs in June and is usually not in areas that continue to hold snow that late in the year.
85	D-A111	“I would like to lend my support for the Snowmobilers in the Flathead Forests and other Nat. Forests. I see no need to add any amendment to your current Forest Plan.”	As a result of litigation, we have been directed by the judicial system to amend out Forest Plan. Please see Chapter 1, Purpose and Need for the Proposal.
86	D-A113	“Please avoid opening more lands to motorized use. “	See #11 and #27.
87	D-A116	“The Forest Service has already taken Soup Creek, Peters Ridge, and other important play areas from me, and I will not support or abide by any other closures! There are no environmental or wildlife impacts you can prove to us so this is plain unconstitutional.”	Public land management agencies are authorized and required to regulate the use of off road vehicles, enforce such regulation, and monitor the effects of off road vehicles. This agency may amend or rescind designations if necessary to protect natural resources (Executive Order 11644, as amended by E.O 11989, 1977). The following passage was taken from Joslin and Youmans (1999) p. 1.8: “Many activities can potentially displace wildlife, reduce productivity, and ultimately increase mortality (Knight and Cole 1995). Weeden (1976) dismissed the notion of nonconsumptive use of wildlife with examples of detrimental effects of nonconsumptive uses of wildlife. He concluded that there is no such thing as a nonconsumptive user, rather, there are consumers who care about wildlife and those who do not. Boyle and Samson (1985) reviewed 166 articles containing original data on the effects and found that in 81% of them, effects were considered negative.” The Forest Service has authority and obligation to manage for multiple use and snowmobile opportunities still exist on the Flathead National Forest under all alternatives. See response #67 in regard to snowmobiling in closed areas.
88	D-A116 D-A154	“The valley’s fragile economy is in the balance here, have you seen how many people on Sat-Sunday at the gas stations, food stores, and restaurants are supported by snowmobilers. “	See economic section in Chapter 3.

#	PR#	Comment	Response
89	D-A116 D-A153	“The dates are too early for closures, snow pack most years is good till at least mid-June.”	Alternative 6 was developed in part to respond to this concern.
90	D-A119	“Alternative 2 seems to be the best choice and, please no modifications on the final decision-it has been well thought out and seems fair to all.”	See #82 and #74.
91	D-A125	“Winter peace and quiet can only be brought about in the wilderness by banning all snowmobiles and 4 wheelers.”	Motorized use is not allowed in Wilderness areas.
92	D-A125	“They should have a fenced in field or race track to run those machines. They have no business around wildlife and quiet areas. “	There are fenced in racetracks for snowmobiles. These are called Snow-X. Snow-X and Hill Climb events occur mostly on private lands. These events and venues are oriented toward competitive riders rather than those that are out for a comfortable tour in the forest. It is appropriate to provide a variety of recreational opportunities on NFS lands, including snowmobiling and quiet use.
93	D-A135	“As a manager of private forest lands I have seen the resulting increase in pressure from motorized recreational use on Stoltze forestlands when motorized use is reduced on forest service lands. Increased trail and road closures on public lands, that lead to higher concentrations of motorized us on Company lands, is unacceptable.”	The Flathead Forest attempts to provide a wide range of recreation opportunities. The Forest and the public very much appreciate the large private timberlands that are open to public use. However, the Forest is obligated to balance motorized use and environmental effects on NFS land.



#	PR#	Comment	Response
94	D-A135	<p>“As a public lands manager, the Forest Service is obligated to provide a wide variety of recreational opportunities. We recognize that this is a difficult task and on one will ever agree on the tradeoffs for using one resource at the expense of another. That is why 1.1 million acres of the 2.3 million acres managed under the Flathead National Forest, has already been set aside as Wilderness area and will never have any sort of motorized recreational activities. The remaining lands should not exclude snowmobiles when the impacts are minimal. As with most activities, these impacts on remain minimal when use is dispersed. That is to say there are noticeable impacts when concentrations of snowmobilers are pushed onto smaller and smaller areas while their numbers continue to grow. Have you studied the impacts that might occur on your ownership, as well as that of the private and state forestlands that are your neighbors?”</p>	<p>Reducing the amount of NFS lands available may either reduce overall use, or displace users to open areas. However, the preferred alternative retains over 90% of currently used areas, and is not expected to significantly change amounts or patterns of use.</p>
95	D-A135	<p>“Your DEIS indicates that lynx distribution and habitat use was considered a significant issue. This is discussed on page 3-39 as is the LCAWS that claims to take a conservative approach in its standards to prevent increased snow compaction through recreational use. How is this approach conservative when we still have very little data on lynx habitat? There may be potential for lynx to be inadvertently trapped or share their prey with coyotes and bobcats (3-38) but do you have the data to prove it at this time? Is it accurate to say that closing areas and roads to snowmobiling would be an overall improvement when you don’t have the data to back that yet?”</p>	<p>Maintaining areas in lynx habitat that do not receive motorized winter use is conservative because these activities were not necessary for lynx survival until the present. Maintaining a more natural environment is conservative, so that if research shows snowmobile use to be detrimental to lynx not all of the pieces are lost. Closing areas and roads to winter motorized use would be an overall improvement since wildlife movements would not be influenced by snowmobile presence and subsequent snow compaction.</p>
96	D-A135	<p>“Why doesn’t one of the alternatives allow for new trails to replace those that are being eliminated in all of the action alternatives? Why are you not planning for the increased numbers of snowmobilers over time?”</p>	<p>Snowmobile use will be accommodated where it is not in conflict with other resource concerns.</p>

#	PR#	Comment	Response
97	D-A146 D-A150	“We are losing access to our favorite places to ride. Please show me the scientific data that snowmobiles are effecting the growth and population of the Grizzly Bear.”	There are no specific studies that demonstrate snowmobiles effect the grizzly bear population. However, Linnell <i>et al.</i> 2000 reviewed several studies that showed individual denning bear response to disturbance and snowmobiles would be expected to result in similar responses once detected. Most of the areas (~90% or more) that were <i>open and used</i> by snowmobiles prior to the settlement agreement are still available under the alternatives.
98	D-A146 D-A153	“I would like to request 1. no net loss 2. open Moose Fire area, 3. Keep all MA2B areas open to snowmobiles. 4. Lost Johnny Bridge to remain open. 5. Keep snowmobiling open to June 1. 6. Keep Bond Creek trail so that locals will be allowed to use routes for access to roads and trails they have traditionally used.”	1. See Chapter 2 2. The Moose Fire area is open in Alternatives 1 and 5. 3. Alternative 5 would continue to allow motorized use in Management Area 2B. Motorized use would not be allowed in MA 2A. 4. Lost Johnny Bridge was in extreme disrepair and a safety hazard, and was therefore removed. 5. A variety of season ending dates are contained in the alternatives. 6. Bond Creek trail may be crossed by snowmobiles but not used as a travelway in Alternative 6.
99	D-A147	“If the grizzly bear population is growing I don’t think they are a reason to close denning areas. How many bears are in the park and the wilderness area where no snocats are allowed. How many are in areas where snocats have been allowed for years. If you don’t have solid #'s of bear population in the Valley floor, Tally Lake, Upper Whitefish and have those #'s for the past 20 years to see if the #'s are up or down then you can’t close areas. Where is the data?”	Increasing grizzly bear sightings and conflicts in recent years in areas that previously provided little grizzly bear sign gives the impression to Montana Fish Wildlife and Parks and others that the population may be expanding. However, there has been no scientific data to back up the empirical evidence. The purpose of this amendment is to establish where and when snowmobiling is appropriate on the forest. It is important to provide non-motorized areas across the forest to provide secure habitat for numerous wildlife species and those individuals who choose to participate in non-motorized forms of recreation. Approximately 90% or more of the areas that were used for snowmobiling prior to the settlement agreement remain available under all alternatives.
100	D-A147	“Don’t include wording motorized use not allowed off of roads. If we can only use roads there will be more accidents and a dangerous place to play.”	This wording applies to MA 2 for all action alternatives to emphasize its non-motorized designation off of existing roads, and to MA 2A for Alternative 5. It would not apply Forest-wide.
101	D-A147	“Please open Moose Fire area.”	This amendment is to provide programmatic direction regarding where snowmobiling is appropriate, not about the burned or unburned condition of the land. Wildlife habitat, roadless areas, and patterns of existing use are all considered in addition to the ability to physically access an area. Moose Fire area is open under Alternatives 1 and 5.

#	PR#	Comment	Response
102	D-A147	“I love the area north of Red Meadow, there are lots of bears up there and they are moving closer to town. Re-open unless you have #’s that we hurt bears.”	Alternatives 1 and 5 allow snowmobile use north of Red Meadow. Alternative 2, which closes much of the North Fork to snowmobiling, reflects the settlement agreement between the MWA and MSA, which reflects a long road to compromise that both parties agreed upon. Alternatives 3, 4, and 6 build on the effort from the settlement agreement with different variations to accommodate other resources. See #65 for snowmobiling effects to denning bears.
103	D-A147 D-A149	“Replace the Lost Johnny Bridge for safe access“	Replacing the Lost Johnny Bridge is outside the scope of this amendment.
104	D-A147	“With no firm data on #s and solid proof we bother animals you can’t shut us out.”	Chapter 3 of the DEIS referenced numerous studies showing the effects of winter recreation on wildlife, as does this FEIS. The Forest Service is required to manage for multiple use and areas for snowmobile use are allowed under all alternatives. Conversely, each alternative contains areas closed to snowmobiling where other values are more important.
105	D-A147	“Open up more area, then you have #s of people spread over a greater area with less traffic in congested areas that are left to use. The more you close the more use on the smaller area left open. Then you get damage.”	The action alternatives provide a range of acreage open to snowmobiling from 763,500 acres to 1,035,600 acres.
106	D-A148	“I oppose being shut out of the trails we have been using, such as Bond Creek. Using the grizzly bear as a reason for all these closures is wrong. There is no scientific data to support a declining population of bears in areas of snowmobile use. Local FW&P game wardens tell me of multiple sightings of bears and tracks in these areas when they are not denning.”	Areas have been closed in the alternatives for a number of reasons, including roadless, national hiking areas, mountain goat winter range, grizzly bear, proposed wilderness, ungulate winter range, desire for quiet recreation, etc. Grizzly bears influenced when snowmobiling should be allowed more so than where snowmobiling should occur. The South Fork grizzly bear study indicated a declining population of grizzlies in their study area—primarily due to mortality.
107	D-A148 D-A149	“If we lose acreage to snowmobile use, we should be provided equal acreage of similar type in another area.”	Snowmobile use will be accommodated where it is not in conflict with other resource concerns.
108	D-A151	“I am afraid my children and grandchildren will be locked out of the forest completely and will never enjoy being able to go wherever they would like on public lands be it by foot, horseback or motorized vehicles. Please help stop the madness of shutting everyone out.”	The only area on the forest with an area closure to all public use is the Little Wolf Fire area, to stop the spread of the noxious weed tansy ragwort.
109	D-A152	“I urge you to support opening additional areas as fires impact areas such as the recent Moose Fire and Wedge Canyon.”	These areas are open in Alternative 1.

#	PR#	Comment	Response
110	D-A152	“A zero loss policy which would not allow areas to be closed without opening or trading for new areas would help to even out the environmental extremist movement. This movement is resulting in the loss of public multiple use lands to both winter and summer use.”	This amendment will set direction for winter motorized recreation in the foreseeable future. It is not feasible to set policy that will account for unknown issues in the future. It is possible that currently closed areas could become open, and/or currently open areas become closed. We cannot speculate on where those areas might be or what the effects would be.
111	D-A153	“Show us specific data to back our effects on Grizzly Bear.”	See response to #97.
112	D-A154	“I really cannot imagine how snowmobiles could possibly be hurting any vegetation.”	As described in the vegetation section in Chapter 3, snowmobiling is for the most part, benign in terms of harming vegetation. Some saplings may be scarred, and riding during early or late season without adequate snow cover may remove leaves from plants, but this is not significant at the forest scale.
113	D-A154	“As for the snowmobile tracks I can only imagine these tracks helping wildlife move more freely to feed – this way they have a packed trail to move around on.”	Packed trails do facilitate easier movement of some wildlife species, but these trails reduce the insulation quality of subnival habitat for small mammals, can effect ungulate mortality rates from wolves, displace wildlife depending upon the frequency of use, and potentially effect mortality of some species.
114	D-A154	“When public land is shut down for access, the few areas left open will become more and more unsafe as more snowmobilers are shoved into fewer areas.”	The action alternatives provide a range of acreage open to snowmobiling from 763,500 acres to 1,035,600 acres
115	D-A154	I would like to see Nasukoin, Huntsberger and Whale Creek stay open. Trade Diamond Peak for some of those areas.	Nasukoin, Huntsberger, and Whale Creek are open under Alternative 5. Diamond Peak, within MA 2A, would be closed to motorized use under Alt. 5.
116	D-A154	“I would like to know if snowmobiling has had such an impact on the grizzly bears, why is it the population of grizzlies has continued to grow? I would ask for a more in depth study as to how we actually have any impact on grizzlies whatsoever.”	See response to #65, #97 and #106.
117	D-A156	“I am an American citizen and feel I have rights to use the national forest land. Why are you locking the American people out of their land?”	This amendment does not propose to lock anyone out of the National Forest. It may change the mode of transportation in some areas.
118	D-A158	“I am concerned that all of your alternatives (except no. 1) will congest the areas left open to the point of future problems.”	The majority of areas (>90%) receiving a high amount of use remain open to snowmobiling in four of the six alternatives.

#	PR#	Comment	Response
119	D-A161	“I am a snowmachiner who would like to know where I will be able to ride when Diamond Peak, China Basin, Red Meadows Lake area, Lost Johnny, Lid Creek, and all other areas have grown in.”	Recent fires burned 31,200 acres within areas open to snowmobiling in the FEIS preferred alternative. See Chapter 2, “Alternatives considered but dropped from further study” for discussion on potential future actions to accommodate continued use in areas open and suitable for snowmobile use.
120	D-A166	“As per the Forest Plan with the 2A amendment addressed as the forest did the amendment and sat on it dig it out sign it and get on with your Forest Plan Revision.”	See Chapter 2, Alternatives considered but dropped from further study.
121	D-A166	“Don’t restrict any 2B areas or deny their access or use.”	Alternatives 1 and 5 respond to this request.
122	D-A168	“We would like to continue snowmobiling through the spring for as long as the snow allows. March 15 is just a ridiculous closing date.”	Closing dates vary among the different alternatives, and provide choices for the Decision maker.
123	D-A168	“If we are continually shut out of areas then the areas that remain open will get congested. This is currently happening in the Eureka Ten Lakes area as more and more of us from the Flathead Valley go up there.”	The Flathead and neighboring Forests attempt to provide a wide range of recreation opportunities. Hopefully the wide range does provide for places to ride where snowmobilers don’t feel congested.
124	D-A168	“Our local economy is greatly affected by snowmobiling. A simple drive through Kalispell, Whitefish, and Columbia Falls any Saturday or Sunday morning is proof enough.”	See economics section in Chapter 3.
125	D-A168	“I ask that you carefully consider the wording that is used in your EIS. Phrases like “motorized access is not allowed off of forest system, roads” could be taken literally by extremists.”	One of the needs for this proposal is to clarify direction regarding winter motorized access. For management areas with a primitive non-motorized classification in the recreation opportunity spectrum (i.e. MA 2), the phrase is meant to be taken literally by everyone.
126	D-A169	“There has been no harmful effects to the grizzly bears that has ever been documented and bear numbers are increasing.”	See response to #65 and #106.
127	D-A170	“North Fork should have more open area specifically north of Red Meadow Lake. Please leave Bond Creek open for safety issue. “	Closures proposed north of Red Meadow Lake protect roadless areas. Much of the area is open under Alternative 5. Bond Creek Trail may be crossed under Alternative 3 and 6, and is open under Alternative 5.

#	PR#	Comment	Response
128	D-A172	“The only alternative that is fair to snowmobilers is Alternative #1. Furthermore, I believe that all MA 2A and MA 2B areas should remain open.”	Due to inconsistencies and discrepancies in the current forest plan, we have been directed to clarify management direction for winter motorized use. Alternative 1 does not do that. See also response to #167.
129	D-188	“I am personally offended that eastside sources have more impact on our snowmobiling than the local need.”	Public input is accepted from all members of the American public.
130	D-188	“I want Sixmile- Soup Creek Bond trail to the east left open. As a property owner on Swan Lake in town I like my local access left alone as it has been for 32 years.”	Access on the National Forests changes as resource concerns arise. Motorized access is not guaranteed in perpetuity.
131	D-200	“We need more access under your preferred alternative in the Northfork for sportsmen and fishermen. A 1000 ft. wide access to Nasukoin and Whale Lakes up the old logging roads would be a family type outing.”	Access to Nasukoin and Whale Lake is available with Alternative 5. Several lakes are accessible under Alternatives 2, 3, and 4.
132	D-A200	“We also need more access in high country for trapping, of which most of that could be limited to marten or weasel, so lynx and wolverine would not be caught.”	None of the alternatives were formed with the intention of restricting trapping or trapping access. Area closures for other resource concerns has a secondary effect of limiting motorized access, but ~90% or more of the area available and used by snowmobiles prior to the settlement agreement would remain open under each alternative.
133	D-A207	“Why does the Forest Service seriously consider expanding the use of vehicles, for recreational purposes, which degrade the environment?”	All action alternatives would <i>decrease</i> the amount of area traditionally available to snowmobile, by hundreds of thousands of acres. See chapter 3, soil, water and vegetation sections for effects.
134	D-A207	“Recreation? Access? That’s what legs are for in the woods.”	Not everyone has the physical ability to ambulate through the snow. There are a variety of forms of recreation recognized on public lands.
135	D-A207	“What right do they have to recreate in a way which directly damages the forest environment? Why would the Forest Service give snowmobilers that right?”	Effects analyses in chapter 3 do not indicate the environment is being damaged.
136	D-A217	“We would like assurance that there will be somewhere we need not fight noise, pollution, ruined trails, and being crowded out of certain areas due to too much traffic etc.”	The Bob Marshall Wilderness, the Great Bear Wilderness, the Mission Mountain Wilderness, Jewel Basin Hiking Area, and various research natural areas are provided on the forest where snowmobiling is not allowed. Glacier National Park is adjacent to the Flathead National Forest, and snowmobiling is not allowed there.

#	PR#	Comment	Response
137	D-A218	“It is very difficult, if not impossible, to ignore the effects of the snowmobiles on the land itself, when the snowmelts and there are scars and washouts- wrecking an area that used to be unspoiled, and making it unlivable for various wildlife as well.”	We would be interested to know where these scars and washouts are occurring. The Forest conducts annual monitoring of snowmobile use, and we are unaware of any areas damaged to the point of making it unlivable for wildlife or causing washouts.
138	D-A221	“I want to have as much riding area for snowmobiles as we had in the beginning, and to have it in areas that will provide a comfortable area with different types of riding so that all snowmobile riders may enjoy those areas.”	The alternatives were developed to provide a range of options.
139	D-A222 Thru D-A232	“For years snowmobilers and Grizzly Bears have coexisted with no damage to bears. Their population is increasing as demonstrated by increasing sightings at lower elevations. Until there is documentation to prove the need for change allow snowmobilers to keep riding as in the past.”	See response #65, #99 and #106.
140	D-A222 thru D-A232	“Placing restrictions on snowmobiling in this area will cause a loss to the economy. Local “sledders” will go elsewhere and tourists will find other places to go. This impacts all lodging, food and fuel providers as well as loss of license fees from those who simply give up the sport. The trickle down affects also applies to business who sell or rent snowmobiles and the people who are employed by them.”	See economics section in Chapter 3.
141	D-A222 thru D-A232	“The impact of the closed areas was felt last year in the Ten Lakes Area. “Sledders” from the Flathead headed north causing crowded parking and playing conditions and resulting in talk of dated permit use of Ten Lakes Area.”	Contact with the Kootenai National Forest, land managers of the Ten Lakes Area, indicated that no discussion have taken place involving a permit system.
142	D-A233	“Bond Creek needs to be left open for safety for landowners!”	The Bond Creek trail is open under Alternatives, 1, 3, and 5. It may be crossed by snowmobilers under Alternative 6.
143	D-A234	“We are becoming very disgruntled on how more and more of the public lands are being closed to the majority of the public. This land should be available to everyone, not just a couple of groups such as hikers or cross country skiers.”	Roaded access to National Forest lands is not guaranteed. No Flathead Forest lands are closed to the public under Forest Plan direction or with this amendment. There are restrictions on the use of motorized vehicles, however.

#	PR#	Comment	Response
144	D-A237	“Your “No Action Alternative” is not legal under the NEPA process. The 98/99 Snowmobile Trail Map published by the FNF indicates no closure earlier than April 15 but your “No Action Alternative” has indicated March 15 as the closure date.”	The Forest Plan clearly states that motorized use in much of the NCDE must halt at the end of the denning period, which it identifies as March 15. The Forest has not enforced this date in the past.
145	D-A237	“No motorized recreation monitoring data is provided nor evaluated in the DEIS to support the purpose and need for the actions proposed in the DEIS which is required by the Forest Plan.”	Snowmobile monitoring data is cited on page 3-4 of the DEIS.
146	D-A237	“How about “no net loss” to snowmobiling. With the Moose Fire and Wedge Fire, and no doubt more possible, those moonscapes should provide snowmobiling areas for a good many years. This proposal would make up for many areas that have been lost to litigation.”	See response to #119.
147	D-A237	“Provide a “Community Alternative”: The local community deserves such.”	Alternatives 3 and 6 were developed to respond to local community concerns.
148	D-A237	“Expand the China Basin Area.”	China Basin would be open under Alternative 5.
149	D-A237	“Leave the Bond Creek Trail Area open for the local village people and others for safety and enjoyment of others. Any harm to so called environment can hardly be substantiated to justify closure to exclude humans and snowmachines.”	The Bond Creek Trail is open under Alternative 5. It may be crossed under Alternative 6. This proposal does not include closing humans out of any area on the Forest.
150	D-A237	“Leave Lost Johnny and Six Mile areas open until June 1 <sup>st</sup> .”	A variety of dates are proposed between the alternatives.
151	D-A237	“Consider more and regular monitoring and law enforcement for Jewel Basin.”	Monitoring and law enforcement will occur as budget and personnel allow. Requests will be made annually for funding.
152	D-A237	“The DEIS contains no scientific data or monitoring data that shows snowmobiles affect grizzly bears.”	See response to #97.
153	D-A237	“Open Road #316. Need for fire escape routes as well as snowmobiling.”	Road 316 is open to snowmobile use.



#	PR#	Comment	Response
154	D-A241	“I am disappointed that the Flathead National Forest chose to endorse or select Alternative 3, without demonstrating the kind of balance so carefully struck in the original agreement. Alternative 3 seems to cave in to snowmobilers without even a token of give and take. While giving snowmobilers more territory to roam –primarily in low elevation areas also coveted by skiers and snowshoers (as well as ungulates) – Alternative 3 does nothing to compensate for lost wildlife security or quiet winter recreational opportunities, particularly in the North Fork river bottoms, Bond Creek and the Swan Valley.”	No alternative has been selected. Alternative 3 was based on overwhelming sentiment on the part of local landowners in the North Fork to <i>retain</i> access across small parcels of NFS land to reach private land. Having given up in the settlement agreement 357,600 acres of what was traditionally open to snowmobiling, it seemed less than environmentally heinous to give them back 9,200 acres for local access. Alternative 3 protects 300 more acres of mountain goat winter range than Alternative 2. The majority of the North Fork river bottom remains closed to snowmobiling in Alternative 3. The Flathead National Forest provides 2.3 million acres to skiers and snowshoers, with 51% to 679% of that providing quiet winter recreational opportunities, depending on which alternative is chosen. All action alternatives increase the area for quiet recreation and wildlife security.
155	D-A241	“State of Montana snowmobile policy states that snowmobiling in elk and mountain goat winter range should “be avoided at all costs” and that land managers restrict snowmobile use to ensure “minimal disturbance” in “grizzly bear spring range” and “known grizzly bear denning areas”. “	Alternatives 2, 3, and 4 specifically reduce snowmobiling in mountain goat winter range. Snowmobiling is eliminated from mountain goat winter range in Alternative 6. 63-68% of elk winter range is closed to snowmobiling with the action alternatives, as opposed to 55% with the no action alternative. Snowmobile use would be restricted on 92% of modeled grizzly bear habitat with Alternatives 2, 3, or 4, and on 84% with Alternative 5. See Chapter 3.
156	D-A241	“It is vitally important that the Flathead National Forest <u>not</u> adopt motorized winter recreation opening and closing dates that create more conflict with established science, grizzly bears, or the general public – the majority of whom do not snowmobile.”	A variety of dates are proposed.
157	D-A241	“It is my understanding that the Flathead Winter Recreation Agreement specified a cap on snowmobiling in the Frozen Lake area. This was part of the legal settlement of the claim. I find no reference of this item in the DEIS.”	The agreement states that the Forest Service shall not authorize grooming of any portion of the snowmobile route between the North Fork Flathead Road and Frozen Lake.
158	D-A241	“It is important the Flathead National Forest make explicit commitment to monitoring and enforcement and thus to the success of this amendment by stating so in the FEIS and ROD.”	Monitoring and enforcement will occur as budget allows. Funding will be requested for these items annually. The settlement agreement calls for multi-party monitoring, which has been underway. Enforcement efforts have been increased since the settlement agreement was put in place.

#	PR#	Comment	Response
159	D-A243	“The two primary user groups as represented by the Montana Wilderness Association and the Montana Snowmobile Association have put in countless hours negotiating a mutually acceptable alternative – it would be pure foolishness to ignore what the local forest users are asking for!”	We agree. Since the Montana Snowmobile Association is based in Helena and the local people did not feel they were represented in the negotiations, we considered what the Flathead Snowmobile Association (local) and local residents of the North Fork and Swan Lake asked for in developing Alternative 3, as well as input from other commentors.
160	D-A244	“Because the physiological effects of snowmobile activity on wildlife is not well known, the USGS suggests for consideration an additional citation to the Amendment’s list of references. Recent research (Creel et al. 2002) addresses potential stress caused by snowmobiles by monitoring fecal glucocorticoid (GC) levels in both elk and wolves. These data found risen in GC concentrations correlated with snowmobile usage. The potential significance of this research is that elevated GC levels are associated with physiologic suppression of mammalian immune systems and reproductive hormones.”	This study will be considered in the wildlife analysis for this FEIS.
161	D-A254	“Why is there no mention of cross-country skiing in the introduction, page 3-3? Cross-country skiers are penetrating ever further into the backcountry and commercial businesses are impacted by ski and equipment sales. It seems to me that this potential conflict of interest should have been addressed otherwise half the equation is missing.”	Where people can or cannot cross-country ski is not at issue in this amendment. The amendment addresses restrictions to motorized use; therefore motorized use was discussed in the introduction to the section on recreation. Other forms of winter recreation and potential conflicts of interest are addressed on subsequent pages in Chapter 3 of both the DEIS and FEIS.
162	D-A254	“On page 3-5 where non-motorized use is addressed you imply that there is sufficient opportunity for solitude in the Jewel Basin, the Forest wilderness areas and Glacier National Park. Are you referring to Wilderness or wilderness: There is a difference.”	By wilderness, we were referring to the Bob Marshall Wilderness, the Great Bear Wilderness, and the Mission Mountain Wilderness. What qualifies as “wilderness” with a small “w” is highly subjective.
163	D-A254	“I would also like to know how you can quantify the final statement on page 3-5.”	Based on the likelihood of an encounter with a snowmobile, the statement “ In the areas mapped as low snowmobile use, there are numerous places available where conflicts between users is likely to be minimal” simply reasons that one would expect to cross paths with a motorized user fewer times in an area of low use than in an area of high use. An exact number of encounters is not possible to predict.

#	PR#	Comment	Response
164	D-A254	“Why does it take a 200’ wide travel corridor to “cool the tracks of liquid-cooled snow machines”? As stated, this width is “where terrain allows”; either a machine needs 200 feet or it doesn’t. If a machine needs 200 feet in Alternative 3 why doesn’t it need it in all of the other alternatives?”	Not all snowmobiles are liquid-cooled. Those that are cannot be run constantly on hard packed snow, but rather need powder snow intermittently to cool the engine. The settlement agreement (Alternative 2) did not accommodate this. It would not be necessary in Alternative 5 because snowmobiles would not be restricted to routes. The crafters of Alternative 4 were not interested in accommodating these particular types of snowmobiles. The wider travel corridor is included in Alternative 6.
165	D-A254	“We have seen lynx south of the Red Meadow Road and tracks in the Moose Creek drainage. If you increase the use season by 45 days are not increasing the potential for an adverse confrontation?”	Traditional use has continued until the snow melted, so the potential for adverse confrontation is not increased by stopping snowmobiling on April 30.
166	D-A254	“I could discover no quantifiable justification for extending the use season for an additional 45 days as proposed in Alternative 3.”	Traditional use has continued until the snow melted. Amendment 19 would have snowmobiling stop on March 15. April 30 was a compromise between the two.
167	D-A257	“Snowmobile restrictions have no scientific support.”	We are authorized and directed under Executive Order 11644 to establish policies and provide for procedures that will ensure that the use of off-road vehicles will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.
168	D-A257	“Mace and Waller “believe” that snowmobiles present a “potential” threat to grizzlies but present no hard evidence to backup the statement.”	Mace and Waller’s (1997) study did not analyze effects to denning bears. Linnell <i>et al.</i> 2000 reviewed several studies that showed individual denning bear response to disturbance and snowmobiles would be expected to result in similar responses once detected. Bears detecting snowmobiles during the non-denning season would be expected to respond similarly to other motorized vehicles in Mace and Waller’s study. See also response to #97.
169	D-A257	“The proposed action represents a major land use change from the existing Forest Plan. If the changed conditions characterized in the Amendment 24 DEIS purpose and need are correct, then NFMA require a Forest Plan Revision, not an Amendment.”	This proposal is focused on a single type of recreational use during one season of the year. About 90% of the area previously used by snowmobiles would remain open to snowmobiles. We don’t see a major land use change. Other features of the management area descriptions or their delineations would not change. The determination of whether this is a significant amendment will be made in the Record of Decision.

#	PR#	Comment	Response
170	D-A257	“The DEIS states that Amendment 19 requires closure between 11/15 and 3/15. This is not correct. The actual amendment, printed as Appendix A to the DN contains no language prohibiting snowmobiling after March 15, therefore the Forest Plan was not legally amended in that respect.”	Appendix A to the DN for Amendment 19 references the non-denning season when considering motorized use. Appendix A also references Appendix TT, which discusses motorized use during the non-denning season. The non-denning season is described in the text of the Decision Notice and cites March 15.
171	D-A257	“The preliminary and ongoing USGS DNA study in the North Fork conducted by Kate Kendall strongly indicates that grizzlies have been thriving in an area that has seen heavy snowmobile use for two decades. Snowmobiling should not be restricted for grizzly protection unless a new, peer-reviewed modern scientific study show the bears are harmed by snowmobiling.”	A grizzly bear population estimate for the entire NCDE has not been conducted, but the current DNA study would accomplish this. There has not been enough monitoring to establish grizzly bear population trends in the North Fork or elsewhere within the NCDE—even with Kate Kendall’s studies in the North Fork. Linnell <i>et al.</i> (2000) and Mace and Waller (1997) revealed the adverse affects of disturbance to denning and non-denning bears respectively. Both were discussed in Chapter 3 of the DEIS.
172	D-A257	“Amendment of expired Forest Plans is illegal.”	The Consolidated Appropriations Resolution (from Congress) 2003 states that we are not in violation of the Forest and Rangeland Renewable Resources Planning Act of 1974 solely because more than 15 years has passed without revision of the plan, provided we are acting in good faith to revise the plan. The Flathead NF is currently in revision. This means the current plan has not “expired”. Further, we have been directed by a Federal judge to amend our plan, and that’s what Amendment 24 proposes to do.
173	D-A257	“In violation of the LRMP, no motorized recreation monitoring data is provided or evaluated in the DEIS to support the purpose and need for this action or any of the proposed alternatives as required by the Forest Plan.”	Snowmobile monitoring data is cited on page 3-4 of the DEIS. See #145.
174	D-A257	“Change all of the seasons to reflect true denning periods for female grizzlies with cubs. Nov. 15 to April 30. More liberal dates should be used where grizzlies do not den.”	Knowledge of local denning periods for grizzly bears indicates December 1 to April 1. There are no snowmobile season dates for areas outside of the NCDE. Alternative 1, 2, 4 and 5 would only allow snowmobiling during the grizzly bear denning period within the NCDE. Alternative 6 would only allow snowmobiling on 3 areas totaling ~52,000 acres within the NCDE during the non-denning period. Alternative 3 allows snowmobiling until April 30 within the NCDE, which would overlap the non-denning season for ~30 days.

#	PR#	Comment	Response
175	D-A257	“Open the Moose Fire area and any other burnt or logged areas to snowmobiles. There is no defensible reason not to open these areas.”	This amendment is to provide programmatic direction regarding where snowmobiling is appropriate, not about the burned or unburned condition of the land. Wildlife habitat, roadless areas, and patterns of existing use are all considered in addition to the ability to physically access an area. See also response to #119.
176	D-A257	“The statement under recreation standards in Appendix A referring to MA 2 that “Motorized access is not allowed off of existing forest system roads.” Must be removed because it may lead to closing of some play areas.”	Management Area 2 is primitive non-motorized. Motorized use <i>is</i> prohibited there. There are no (legal) play areas in MA 2.
177	D-A257	“Leave the Bond Creek trail open. This is a safety issue for local residents, especially children, who use this trail to access other open areas as well as other residences.”	The Bond Creek trail is open under Alternative 1 and 5. It is open for over a mile under Alternative 3. Under Alternative 6, it may be crossed to access other open areas or to reach private land,
178	D-A257	“Replace the Lost Johnny Bridge. The current crossing is unsafe.”	The current crossing <i>is</i> unsafe, and is scheduled for removal in the fall of 2003. Bridge replacement is outside the scope of this proposal.
179	D-A257	“Vigorously defend FNF’s prior decision to leave in the culverts on FDR 316. Anything less would constitute a failure to uphold the agreement.”	The Moose Post-Fire Decision authorized the retention of these culverts in reclaimed roads. That decision is currently under litigation. The Forest will defend the Decision.
180	D-A257	“Keep the 6 Mile and Lost Johnny open.”	Six mile and Lost Johnny are open under all alternatives.
181	D-A257	“Include a NO NET LOSS policy that provides that there will be no further reduction of snowmobiling access on the Flathead Forest. As play areas and trails revegetate, they will eventually become unusable for snowmobiling. The NO NET LOSS policy must provide for either reopening those areas or opening other areas to snowmobilers.”	See response to #76.

#	PR#	Comment	Response
182	D-A257	MFMU would like to remind FNF staff that the presidential executive orders regarding use conflict covered incompatible USE, not incompatible, intolerant, selfish, litigious USER groups.	We refer to Executive Order 11644 – Use of off-road vehicles on the public lands, which states “An estimated 5 million off-road recreational vehicles—motorcycles, minibikes, trail bikes, snowmobiles, dune-buggies, all terrain vehicles, and others—are in use today, and their popularity continues to increase rapidly. The widespread use of such vehicles on the public lands—often for legitimate purposes but also in frequent <b>conflict</b> with wide land and resource management practices, environmental values, and <b>other types of recreational activity</b> —has demonstrated the need for a unified Federal policy toward the use of such vehicles on the public lands.” Further, conflict between user groups is a social reality, and obviously the reason for this amendment.
183	D-A258	“Define routes and play areas for the entire Forest instead of just in the North Fork.”	There are no resource issues to drive this approach. Routes and play areas were defined in the North Fork as part of the negotiations to allow snowmobiling to continue to occur in popular MA 2A areas, not because of environmental concerns.
184	D-A258	“Are the seasonal open and close dates actually based on actual historical snow cover and/or biological studies of various species or were they based more on the wishes of the loudest part of the snowmobile community.”	Bears are known to den from December 1 to April 1. Snowmobilers are known to snowmobile from December 15 until the snow melts in June. Several options for closure dates are contained in the alternatives.
185	D-A275	“Executive order 11644 (as amended by E.O. 11989) covers “Use of Off-Road Vehicles on the Public Lands.”	E.O. 11644 establishes policies and provides procedures that will ensure that the use of the off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and minimize conflicts among the various uses of those lands.
186	D-A275	“Springtime limitations may better meet the language of E.O. 11644 which states, “areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.””	All action alternatives reduce the amount of wildlife habitat influenced by snowmobiles and impose springtime limitations.

#	PR#	Comment	Response
187	D-A275	“The difference in wildlife effects, particularly the effects on grizzly bear and wolverine, from allowing the snowmobiling season to start in the fall season on November 15 rather than December 1 is not clear. It would be helpful if this was clarified in the FEIS.”	<p>Several of the grizzly den entry dates recorded in Mace and Waller’s (1997) study occurred after November 15. Allowing snowmobiling to take place prior to den entry is more likely to displace grizzly bears. Allowing two extra weeks of snowmobiling at the beginning of the season could cause additional disturbance and displacement of wolverines, but they are not associated with natal dens until later in the snowmobiling season. Using December 1 through March 31 as the grizzly bear denning season should be used for the reasons outlined below.</p> <p>An NCDE access management task group was convened to reevaluate motorized access in grizzly bear habitat and Mace and Waller’s (1997) findings were used as the basis for much of the reevaluation. In 1998, the NCDE Access Technical Group produced a proposed rule set for access management in the NCDE and that proposed rule set included a set of definitions including one called “period of application”. That definition said, “Grizzly bear access management will apply during the non-denning period, and include April 1 through November 30 of each year”. Although the proposed rule set has not been formally adopted, the dates they developed for application of grizzly bear access management are arguably the best to use at this time because they are based on the most recent in-depth study of grizzly bears in northwest Montana and were developed by an interagency group.</p>
188	D-A285	“Snomobiles are clearly both “motorized” and “vehicles”. How can the Forest arbitrarily claim they’re exempt from inclusion in “Motorized access management” standards – Amendment 19?”	Some level of snowmobiling has traditionally continued throughout the spring in grizzly bear habitat on the forest and has not previously been counted when calculating numbers for bear management units. This change to the standards of Appendix TT recognizes existing use and practice. Levels of spring use have been and will be monitored and disclosed, as well as the effects to bears, in the narrative section of A19 monitoring reports.
189	D-A285	“Alternative 3 seems to turn snowmobiles loose to ride anywhere they choose on a wild landscape of three quarters of a million acres.”	Alternative 3, along with all the other action alternatives, would <b>reduce</b> the area in which snowmobiling has traditionally occurred on the Flathead National Forest. It would allow 9,200 acres more than the settlement agreement, equal to an area that is less than one percent of the Flathead National Forest. Alternative 3 allows snowmobiling on 348,400 acres <b>less</b> than that allowed in the existing condition.

#	PR#	Comment	Response
190	D-A285	“Alternative 2, lists the denning period incorrectly as November 15-March 15, during which time snowmobiles would be allowed. Alternative 3 departs even further from science and the law. It proposes a snowmobile season of December 1 – April 30. Both share a common problem – allowing snowmobiles on the landscape when grizzly bears are known to still be active – openly acknowledging, and then ignoring the impact.”	See #187.
191	D-A285	“The Forest is required to base decisions affecting listed species on the “best available science”. In this case, that is widely acknowledged to be Mace and Waller (1997). Their research indicates than an opening date of December 1 <sup>st</sup> would be likely to impact two-thirds of the male grizzlies. It further suggests that a closing date of April 30 <sup>th</sup> risks impacts to many grizzlies ranging from 2-7 weeks. For example, Alternative 3’s ending date of April 30 would have impacted all eight of Mace & Waller’s marked grizzlies when earliest emergence is considered, and 5 of 8 if latest emergence was used. Both dates increase the likelihood of “take”.”	In addition to the response to #187 about NCDE access management task group: Thirty radio collared grizzly bears provided information on 78 denning episodes. Mean den entry and exit dates were from 59 and 54 denning episodes respectively (Mace and Waller 1997, p. 37). Assuming a normal distribution, over 84% of all first dates of den entry for male grizzly bears was prior to November 21 and less than 4% had not denned by December 1. Allowing snowmobiling until April 30 does overlap the time when most bears are emerging from dens. Alternatives 1, 2, 4, 5 and 6 would end or reduce snowmobile use to coincide with the grizzly bear denning period, Alternative 3 and its allowable snowmobile use period is available to give the decision maker additional options.
192	D-A285	“Most researchers of large carnivores readily agree that grizzlies are far more sensitive to motorized intrusion than either wolves or elk, yet nowhere to we see any indication that the Forest has incorporated that information into any of its alternatives.”	There have been no studies on the effects of snowmobiling on denning grizzly bears, and none indicating denning grizzly bears are more sensitive to “motorized intrusion” than wolves or elk. Additionally, alternatives 1, 2, 4, 5, and 6 close all or nearly all of the NCDE to snowmobile use during the non-denning period. See response to #76.
193	D-A285	“The tables on page 3-33 through 3-34 refer to “modeled grizzly bear denning habitat”, yet don’t say whose model this is, whether it’s firmly grounded in best science from the NCDE, or why black and white maps are not provided on so important a topic.”	Denning habitat was modeled on denning site data from the South Fork Grizzly Bear Study (Mace and Waller 1997). Potential denning habitat was determined to be $\geq$ 5900 feet and $\geq$ 45% slope. Areas of rock were eliminated as potential sites. Maps are included in the project record. (Project Record O-55).



#	PR#	Comment	Response
194	D-A285	“The DEIS refers to “potential denning habitat” in a number of places, but makes no reference to how much of this is based on actual, verified denning areas based on work over the last 25 years by Mace, Manley, Waller, Jonkel, McLellan, Servheen and others. How much of the “model” has been ground-truthed with actual data?”	See #193.
195	D-A285	“All of the alternatives, by actively encouraging off road riding on a landscape scale, unwisely elevate impacts to ungulates, while illegally setting back wolf recovery in the Northern Rockies.”	None of the alternatives “encourage” off road riding, they simply establish where and when snowmobiling would be allowed on a programmatic scale. Additional site specific restrictions could be implemented if resource concerns warrant. Impacts to wolves and ungulates are discussed in the wildlife section of chapter 3 in the DEIS and this FEIS.
196	D-A295	“I am disturbed at the opening of areas such as Huntsberger, Chain and Link Lakes to snowmobile use.”	Snowmobile use has never been restricted at Huntsberger, Chain and Link Lakes.
197	D-A301	“The Flathead NF’s “Preferred” Alternative #3 substantially deviates from the agreement reached by the Montana Snowmobile Association and the Montana Wilderness Association.”	See #74 and #82.
198	D-A301	“I am particularly disturbed by the deletion of the lower section of Bond Creek as a “quiet winter trail”, opening it as a legal snowmobile access point. During the winters I skied the area in the 1980’s there was no evident use of the Bond Creek area by snowmobiles. The push to turn it into a new entry point for snowmobile use in the central Swans has potentially serious implications that I believe the forest’s officers have not adequately considered...The goat population in the Swan Range is declining for unknown reasons. Please eliminate Alternative 3 from further consideration.”	According to local snowmobile users in the Swan Lake area, the Bond Creek Trail area is used to access areas that are open to snowmobiling further south. Allowing continued use is not a push to turn it into a new entry point. Alternative 3 would protect more goat habitat than Alternatives 1, 2, or 5. Closing the entire trail would force riders along the shoulder of Highway 83 to reach Lost Creek.

#	PR#	Comment	Response
199	D-A304	“It is especially important that any route between Teepee Lake and Wedge Canyon NOT be open to snowmobiles. There is no road or track there now and it would be terrible to have this listed as a new palace for snowmobiles which would then be wandering all over the place. This is an area of heavy wildlife use partly because there are no snowmobiles.”	See #74.
200	D-A307	“I urge the Forest Service to adopt Alternative 2, and implement extensive monitoring and adaptive management strategies to minimize impacts to wildlife and quiet recreational opportunities.”	Monitoring has occurred for several years and will continue. The monitoring plan was inadvertently left out of the DEIS, and is included in this FEIS. Site-specific management may occur in the future if significant impacts to wildlife become apparent. Multi-party monitoring is in place.
201	D-A308	“Now the political process and your preferred alternative would erode these efforts to settle a number of long standing issues, agreed to in honest negotiations – even if court coerced.”	On the contrary, the parties to the settlement agreement have continued to meet and discuss the alternatives throughout this planning process. Public input also helped shape the alternatives. The National Environmental Policy Act does not allow our decisions to be made in a vacuum.
202	D-A319	“The DEIS contains an inadequate range of alternatives. The DEIS contains no alternative that limits snowmobiling to designated routes and play areas across the forest, rather than just in the North Fork as in some alternatives.”	There are no resource concerns to drive such an alternative. See alternatives considered but dropped from further consideration in Chapter 2 in the FEIS.
203	D-A319	“The DEIS makes no mention whatsoever of our request for an alternative which limits all motorized vehicles to those roads designated open to conventional passenger vehicles such as cars and pickups.”	See # 29. Also see alternatives considered but dropped from further consideration in Chapter 2 in the FEIS.
204	D-319	“We ask that the DEIS fully and truthfully disclose the ability of the Forest Service to enforce the use restrictions detailed in each alternative and to fully disclose the degree to which physically facilitating motorized vehicle use (by providing culverts, bridges, road and trail prisms) increases reliance on scarce law enforcement to then attempt to stem inappropriate use.”	The level of enforcement depends on annual budgets from Congress. This amendment programmatically describes what areas on the landscape are open to winter motorized use, it is not meant to authorize individual infrastructure facilities.

#	PR#	Comment	Response
205	D-A319	“The preferred alternative certainly must comply with Amendment 19. Moreover, proposing a Wildlife Alternative that relaxes rather than tightens the Amendment 19 prohibitions is a farce, pure and simple. We view the DEIS Preferred Alternative and Wildlife Alternative as an outright attempt to make Fish and Wildlife Service the “bad cop” when it objects to the unreasonable prohibition dates/periods.”	Amendment 19 is part of the Forest Plan. Amendment 24 <i>amends</i> the Forest Plan. The dates in the “wildlife alternative” are based on local biological data, as described in the Alternative 4 description in Chapter 2, and in the wildlife analysis in Chapter 3. The Fish and Wildlife Service is the Federal regulatory agency for threatened and endangered species.
206	D-A319	“Amendment 24 violates NFMA by issuing Forest Plan amendments that negate and supercede one another, rather than being consistent and dovetailing with one another.”	There is nothing in NFMA that restricts the agency from considering new information and issuing a new decision that may change a previous decision.
207	D-A319	“The DEIS fails entirely to address the conflict made apparent in the Moose Post-Fire Project, wherein 10 culverts are to be left in roads to decommissioned under Amendment 19.”	The Forest Plan, <i>as amended</i> by the Moose Decision, allows the 10 culverts to remain in place and the roads to be decommissioned. This was done in consultation with the US Fish and Wildlife Service, who issued a Biological Opinion with terms and conditions and an incidental take statement. We are uncertain to what conflict you refer. These roads are snowmobile routes under all alternatives.
208	D-A319	“The DEIS at 1-5 states that snowmobile grooming is allowed until April 1 in the Proposed Action Alternative 2, even though the snowmobile season closure date is March 15! Is that arbitrary or what?”	This is merely a reflection of the existing condition. Grooming in Canyon Creek is done under a challenge cost share agreement with the State of Montana that has been in place for many years. The effects of this were analyzed under the Big Mountain Decision, with concurrence of effects to T & E species by the US Fish and Wildlife Service.
209	D-A319	“The Wildlife Alternative ironically includes an extended snowmobile season that is bad for wolverine, as well as grizzly bear, lynx, and other wildlife. Moreover, none of the alternatives take significant measures to prohibit snowmobiling in the grizzly bear denning habitat identified in Comer and Young’s biological assessment maps. Relying on meaningless percentages modeled denning habitat rather than area-specific impacts and conflicts renders the DEIS deficient.”	The length of the snowmobiling season in Alternative 4 is the same as Alternatives 1, 2, and 5, and 1 month shorter than Alternative 3. Alternative 4 shifts the snowmobiling season to coincide with the denning season established by the NCDE Access Technical Group, which is discussed in greater detail in #187. A large portion of the forest and potential grizzly bear denning habitat would be closed to snowmobiling under all action alternatives and would prohibit snowmobiling on a large portion of potential habitat that allowed snowmobile use prior to the settlement agreement. Effects of snowmobiling on wildlife are discussed in chapter 3 of the DEIS and this FEIS.

#	PR#	Comment	Response
210	D-A319	“The alternatives violate the Lynx Conservation Strategy by allowing an increase in designated snowmobile routes.”	The Lynx Biology Team approved modifications of Lynx Conservation Assessment and Strategy in August of 2003. The revised text in Conservation Measures to Address Risk Factors Affecting Lynx Productivity (Page 7-4): C. Recreation Management (Page 7-9) says: “On federal lands in lynx habitat, allow no net increase in groomed or designated over-the-snow routes and designated snowmobile play areas by LAU unless the designation serves to consolidate unregulated use and improves lynx habitat.” All alternatives increasing designated routes and play areas meet this definition, and therefore comply with the LCAS.
211	D-A319	“Forest Service regulations require a special use permit be obtained prior to group competitive events, yet none are requested or issued for “high marking” competitions.”	We didn’t say anything about “groups” or “events”. It only takes two for a contest. To avoid confusion about this in the FEIS, we’ll strike the word competitive in regard to high marking.
212	D-A319	“The DEIS acknowledges that snowmobile use of roads after April 1 may harm grizzly bear and their use of dens, the areas around dens during den emergence, and/or lower elevation spring habitats. The DEIS goes on to allow such use in its Preferred Alternative 3, stating snowmobiling “would be allowed to continue well past den emergence on roads that in many cases were gated, bermed, or decommissioned to improve grizzly bear habitat security”. This is an unwarranted and unlawful violation of intended habitat security.”	Through numerous comments and discussions from the public and settlement agreement parties it was clear that a new alternative needed to be constructed that limited snowmobiling to the denning period for the majority of the forest within the NCDE, but also permitted some limited amount of snowmobiling in the spring after grizzly bear den emergence. Alternative 6 in the FEIS does just that.
213	D-A319	“The Flathead is keeping its blinders on in attempting to minimize the degree to which snowmobiles are damaging vegetation and soils, all the while proposing in its Preferred Alternative 3 to lengthen the permitted snowmobile season so even more such damage can occur!”	Neither the Forest Soil Scientist nor any silviculturist on the Forest has found damage by snowmobiling to be at any level to cause concern on an ecosystem basis. We have investigated reports, and not found any substantially disturbed areas.
214	D-A319	“The DEIS contains no adequate program for monitoring either snowmobile use or its effects on wildlife or other resources.”	The monitoring plan was inadvertently left out of the DEIS. It is included in the FEIS.
215	D-A322	“Snowmobiles don’t transport weeds, don’t churn up the ground, they don’t harm animals because most animals are at lower elevations in winter or hibernating.”	See Chapter 3, Environmental Consequences section.

#	PR#	Comment	Response
216	D-A323	“I would like to see a less restrictive alternative that allows for access more than 100 feet off the road. Restrictions like that only encourage more conflicts between the various users. Open up the North Fork to snowmobiling. There are already 1000’s of acres out of reach by snowmobile, but when they become available like after the Moose/Wedge/Robert Fires, we can disperse into those areas and have fewer conflicts with other users.”	See Alternative 5.
217	D-A325	“I would like to include the fact that you think that the vegetation is greatly effected by snowmobilers in the winter time. I feel that this statement is not true. The fact that a snowmobile that weights 600 lbs. spanned over 8 foot long effects the vegetation that is buried 10-12 feet below a bed of snow. “	The vegetation effects analysis in Chapter 3 of the DEIS states that vegetation may be marginally affected in early or late season (Page 3-86, DEIS).
218	D-A325	“The fact that you think that the grizzly bear is affected during the late month of March. I have been snowmobiling for ten years and I have not yet <u>ever</u> ran into a grizzly bear that is “being disturbed during its recollection time after it is coming out of the den.””	Even though grizzly bears and other wildlife may not be observed while snowmobiling during any part of the season does not mean they are not present or affected. Forest biologists expect denning bears detecting snowmobiles would have a similar response to that detailed in Linnell <i>et al</i> ’s (2000) literature review, and non-denning bears would be expected to behave similar to the bears encountering motorized use in Mace and Waller’s (1997) study.
219	D-A325	“The fact of you driving us out of the snowmobiling area by closing down areas is one of the DUMBEST things you could do. It opens up more opportunities for you to take away more areas from us do to the fact of too much travel of motorized vehicles. The sport of snowmobiling is growing each year do to popularity.”	See Alternative 5.
220	D-A325	“Me being a snowmobiler for recreational snowmobiling I feel that the Alternative 3 with the “No Net Loss” with a access date of November 15 to June 1 is the best interest for the snowmobiling community.”	See #110.

#	PR#	Comment	Response
221	D-A327	“To date I have not seen any scientific data presented that snowmobiles do any harm, if there is and it was presented to the clubs, dealers and all snowmobilers would work together to make sure it would be corrected. They are common sense people.”	See #152.
222	D-A327	“I fail to see the logic in extending snowmobile use to spring dates that overlap with important birthing, rearing, or winter use requirements for grizzly bears, mountain goats, wolverines, and other species. I urge the Forest Service to fully justify the beginning and end of all annual seasons for motorized use with sound, documented science.”	Snowmobiling has been occurring for several decades on this forest throughout the spring. All action alternatives reduce the amount of area in which snowmobiling would be allowed to occur, and all consider habitat for grizzly bears, mountain goats, and wolverines. Snowmobiling dates for Alternatives 1, 2 and 5 were based on the denning season dates for Amendment 19. Alternatives 4 and 6 primarily use the dates established by the NCDE Access Technical Group (see response #187). Alternative 3 was developed in response to snowmobilers desire to continue snowmobiling in the spring. The beginning and end of all annual seasons will be decided in consultation with the US Fish and Wildlife Service.
223	D-A340	“There is no reason for closing these lands to snowmobilers. Alternative 2 is designed in response to the 1999 lawsuit, MWA vs. Barbouletos. I believe that agreement was made without adequate consideration of snowmobilers. I urge you to implement Alternative 1 and return snowmobile access to the areas designated in the 1986 travel map.”	Alternative 1 will be considered along with the other five alternatives.
224	D-A342	“I think all the alternatives are slanted towards motorized recreation, in this case, snowmobiles.”	See previous comment. Obviously there is diametrically opposed public opinion when it comes to motorized recreation.
225	D-A351	“Alternative 5, which articulates probably the most available acreage for snowmobiling, fails to include the caveat that the acreage does not include a lot of the current use and play areas.”	The description of Alternative 5 in the DEIS points out that many popular play areas would be closed (page 2-13).
226	D-A351	“I believe the public should be appraised of what biological science went into selection and proposed extension of the snowmobiling season articulated in Alt. 3.”	See #166.
227	D-A351	An identification of the additional acreage difference between Alt. 2 and Alt. 3 would also be appropriate in FEIS documentation.	See description of alternatives in Chapter 2 of the FEIS.

#	PR#	Comment	Response
228	D-A351	“The DEIS is totally lacking in discussion concerning monitoring and enforcement of Amendment 24.”	The monitoring plan was inadvertently left out of the DEIS. It is included in this FEIS.
229	D-A361	“MWA members do not object to several site-specific boundary changes for the North Fork contained in Alternative 3. Those changes should be balanced, however, by correcting oversights in fully protecting forest plan recommended wilderness in Bethel, Scout and Lion Creeks, mountain goat and elk winter ranges, Bond Creek Trail and the Rumble Creek-Holland Trail.”	See Alternative 6 in the FEIS.
230	D-A361	“Flathead snowmobile club members recently suggested a strategy of allowing late season use in specific areas lacking in grizzly dens, where conflict is unlikely to occur. They also suggested seasons ranging as late as June 1. Such sites can be found throughout the Tally Lake District and may exist in some other locations, Crane Mountain, for example.”	The main portion of the Tally Lake District and Crane Mountain are relatively low elevation. The snow does not remain in these areas to allow late season use by snowmobiles.
231	D-A362	“The DEIS is inadequate in assessing the impacts to wildlife from snowmobile use. Wildlife surveys need to be completed to assess whether habitat currently being utilized by species such as lynx, wolverine, grizzly bear (for denning) and others will be negatively affected or will displace wildlife.”	See # 233 and #234.
232	D-A362	“The DEIS does not define what the management strategy is for snowshoe hares, a key prey species for sensitive species as the goshawk, wolverine, and lynx.”	Chapter 3 of the DEIS stated that Hillis <i>et al.</i> (2002) completed a regions, multi-scale lynx habitat assessment. They concluded that the levels of habitat components at the regional and forest scales are consistent with maintaining well-distributed habitat for viable populations of lynx. The LCAS also provides guidance for projects that occur in lynx foraging habitat (which is primarily snowshoe hare habitat). The regional and forest scale lynx habitat assessment and compliance with LCAS guidelines are ways to assure snowshoe hare habitat is available.
233	D-A362	“The Flathead has not developed conservation strategies for wildlife, without these plans for managing wildlife it is impossible to know whether the needs of the species will be met with this Forest Plan amendment.”	Each alternative was analyzed and disclosed the effects on TES, sensitive, MIS and migratory bird species in chapter 3 of the DEIS, and in this FEIS.

#	PR#	Comment	Response
234	D-A362	“The DEIS contains no provisions for monitoring wildlife. This amendment start off blindly not knowing what areas wildlife are using and continues blindly allowing snowmobile use without monitoring displacement of wildlife from important habitats.”	Wildlife data was obtained from MTFWP (ungulate winter range) and models for potential lynx habitat, and potential wolverine and grizzly bear denning habitat were established using scientific data—much of which was gathered in the Flathead Valley. Also See #233
235	D-A362	“The Lynx Conservation Assessment and Strategy does not allow newly designated snowmobile routes in lynx habitat. Since many of the routes in A24 are newly designated and in lynx habitat the Flathead is violating its current interim direction.”	Revised text in the LCAS states “On federal lands in lynx habitat, allow no net increase in groomed or designated over-the-snow routes and designated snowmobile play areas by LAU unless the designation serves to consolidate unregulated use and improves lynx habitat.” Routes in this proposal consolidate existing unregulated use and reduce the impact to lynx habitat.
236	D-A362	“The DEIS contains illegal alternatives in violation of the NEPA. The Preferred Alternative violates Flathead Forest Plan Amendment 19 and other standards, assessments and biological opinions for limiting motorized use during the grizzly bear non-denning period that have been developed over the years.”	The preferred alternative or any action alternative that might be selected would <b>AMEND</b> the Forest Plan, as amended by all previous amendments. (Amendment 19 is not a stand alone document, but is part of the Forest Plan.) For this Amendment 24, a new Biological Opinion will be issued by the US Fish and Wildlife Service, which could take precedence over previous Biological Opinions.
237	D-A362	“The DEIS states that Amendment 24 supercedes any other Forest Plan direction. This is illegal; the Flathead cannot just arbitrarily supercede Forest Plan standards without analyzing the impacts of deleting those standards.”	We have analyzed the effects of the proposed changes in the Draft EIS, this Final EIS, and in the Biological Assessment.
238	D-A362	“The DEIS contains no alternative that limits snowmobiling to designated routes and play areas across the forest. So vast areas of the Forest may be opened up to snowmobile use without an adequate assessment of the impacts to wildlife.”	All action alternatives would reduce the amount of area traditionally open to snowmobiling on the Forest. None of them would open up new areas.
239	D-A363	“I recommend Flathead National Forest add a preferred Alternative 6 banning all snowmobile use, for reasons of noise pollution, air pollution, wildlife harassment, ground pollution (spilled oil and gas), plant protection, soil and snow compaction (takes the air out of the snow & builds ice layers, suffocating plants & animals under the snowpack) and the general peace and quiet of the other 98% of forest users.”	See Chapter 2, “alternatives considered but dropped from further evaluation”.



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#	PR#	Comment	Response
240	D-A372	"I urge the preservation of roadless areas and to designate the Flathead National Forest Wilderness of 2,365,749 acres to always promote solitude."	Designating the entire Flathead Forest as Wilderness is outside the scope of this amendment. The United States Forest Service has <i>always</i> been an agency with a mandate for multiple use.



**Federal Agencies to whom the Draft EIS was sent:**

US Environmental Protection Agency

USDA National Agricultural Library

Office of Environmental Affairs, Department of Interior

Policy and Planning Division, Office of Civil Rights, USDA

Ecosystem Management Coordinator, USDA Forest Service